

January 31, 2022

**VIA ECF**

Honorable Carol B. Amon  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Schonberg et al. v. Strulovich et al. - Case No. 17-cv-2161

Dear Judge Amon:

The Plaintiffs represented by Bronstein, Gewirtz & Grossman LLC (“BGG Firm”)<sup>1</sup> and Defendants represented by Herrick, Feinstein, LLP (“Strulovitch Defendants”) jointly write to update the Court on the status of their efforts to negotiate an agreement that would govern a global arbitration.

As indicated in our letter dated November 16, 2021, the parties finalized the terms of the arbitration agreement and the arbitration panel has confirmed its approval. All participating parties have signed the arbitration agreement, and the preliminary hearings have begun. On January 14, 2022, the Plaintiffs and Strulovitch Defendants filed a stipulation, with a request to so order, staying the claims between them. Unless the Court has any further questions or comments, the parties to this letter respectfully request that the Court so order the stipulation. Thank you.

Respectfully submitted,

/s/ *Yitzchak E. Soloveichik* /s/ *Scott C. Ross*

<p>Yitzchak E. Soloveichik <i>Counsel for Plaintiffs</i></p>	<p>Scott C. Ross <i>Counsel for Strulovitch Defendants</i></p>
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<sup>1</sup> The BGG Firm represents all of the plaintiffs in this action except five: Shimon Asulin, Clara Grossman, Irving Grossman, David Schonfeld, and Pnina Schonfeld.